

Federal Election Commission Washington, DC 20463

:MEMORANDUM

TO:

Greg Baker, Special Counsel

Office of General Counsel

FROM:

Lynn M. Fraser

Director, ADR Office

Krista J. Roche

Assistant Director, ADR Office

CC:

Jeff Jordan, Docket Leader

Complaints Examination & Legal Administration

Patricia Carmona Orrock Chief Compliance Officer

SUBJECT:

ADR 771 (RAD 15L-24)

DATE:

November 5, 2015

Pursuant to Commission procedures to refer a matter to the Office of General Counsel following a rejection to participate in the ADR program by a Respondent, enclosed please find the referral of Strong Country for Today & Tomorrow (SCOTTPAC) and Vincent DeVito, Treasurer (Respondents or the Committee). Impasse was reached on October 26, 2015. Therefore, the ADR Office refers this matter to the Office of General Counsel for appropriate enforcement action. Below please find a summary of the matter.

SUMMARY: The Reports Analysis Division (RAD) Respondents for the failure to refund, reattribute or redesignate excessive contributions made for the 2014 Primary and General Elections. Respondents received excessive contributions totaling \$62,800 for the 2014 Primary and General Elections from twenty-seven (27) individuals and one (1) non-multicandidate committee. The Committee did not refund, reattribute, or redesignate these excessive contributions within the permissible timeframe. These excessive contributions have now been remedied.

The Committee filed Miscellaneous Paper Documents (Form 99s) on January 6, 2015, January 9, 2015, and September 25, 2015, detailing the refunds made to

remedy the excessive contributions. At this time, the Committee wishes to terminate its operations.

The ADR Office records now reflect ADR 771 (RAD 15L-24) as closed. Should you have any questions or concerns, please do not hesitate to contact us.

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: June 10, 2015

ANALYST: Laura Beaufort

I. COMMITTEE:

Strong Country for Today & Tomorrow (SCOTTPAC)

C00560003

Vincent DeVito, Treasurer (2/18/15-Present) Paul Kilgore, Treasurer (3/20/14-2/17/15)

One International Place, 44th Fl. Bowditch & Dewey, LLP

Boston, MA 02110

II. RELEVANT STATUTES:

52 U.S.C. § 30116(a)

11 CFR § 103.3 11 CFR § 110.1

III. BACKGROUND:

Excessive, Prohibited and Other Impermissible Contributions: Failure to Refund, Redesignate, or Reattribute Excessive and Prohibited Contributions Within the Permissible Timeframe

Strong Country for Today & Tomorrow (SCOTTPAC) ("the Committee") received excessive contributions totaling \$62,800.00 for the 2014 Primary and General Elections from twenty-seven (27) individuals and one (1) non-multicandidate political committee. The Committee did not timely refund, reattribute, or redesignate these excessive contributions (Attachment 2).

2014 October Quarterly Report

During the 2014 October Quarterly reporting period, the Committee received excessive contributions totaling \$35,100.00 from fourteen (14) individuals and one (1) non-multicandidate political committee that were not refunded, reattributed, or redesignated within the permissible timeframe (Attachment 2).

On October 15, 2014, the Committee filed the 2014 October Quarterly Report covering the period from August 21, 2014 to September 30, 2014³ (Image 14020860093). This report disclosed excessive contributions totaling \$37,700.00 from fifteen (15) individuals and one (1) non-multicandidate political committee.

On October 23, 2014, the Committee filed an Amended 2014 October Quarterly Report (Image 14021113900). This report disclosed no changes from the original report with regard to excessive contributions.

On December 4, 2014, the Committee filed the 2014 30 Day Post-General Report covering the period from October 16, 2014 to November 24, 2014 (Image 14021332391). This report disclosed a redesignation within the permissible timeframe remedying one (1) individual contribution, totaling \$2,600.00, that was received during the 2014 October Quarterly reporting period.

On December 7, 2014, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2014 October Quarterly Report. The RFAI noted the Committee's receipt of excessive contributions and requested that the Committee take corrective action⁴ (Image 14330067381).

On January 6, 2015, the Committee filed a Miscellaneous Paper Document ("FEC Form 99") outlining the corrective action taken regarding apparent excessive contributions. The FEC Form 99 stated, in part: "Individuals or Committees that appear to exceed the contribution limits have been refunded or reattributed" (Image 15020020830).

Also, on January 9, 2015, the Committee filed the 2014 Year-End Report covering the period from November 25, 2014 to December 31, 2014 (Image 15020032741). This report disclosed refunds totaling \$32,500.00 for contributions from fourteen (14) individuals and one (1) non-multicandidate political committee, received during the 2014 October Quarterly reporting period, that were made outside the permissible timeframe (Attachment 2).

2014 12 Day Pre-General Report

During the 2014 12 Day Pre-General reporting period, the Committee received excessive contributions totaling \$22,450.00 from ten (10) individuals that were not refunded, reattributed, or redesignated within the permissible timeframe (Attachment 2).

On October 23, 2014, the Committee filed the 2014 12 Day Pre-General Report covering the period from October 1, 2014 to October 15, 2014 (Image 14021113374).

³ The coverage dates for the 2014 October Quarterly Report were adjusted to reflect the coverage dates of the 2014 12 Day Pre-Primary Report covering July 1, 2014 to August 20, 2014.

⁴ At the time the RAD Analyst reviewed the Amended 2014 October Quarterly Report, the 2014 30 Day Post-General Report had not yet been received by the FEC. As a result, the RFAI cited one (1) excessive contribution that had been remedied on the 2014 30 Day Post-General Report.

This report disclosed excessive contributions totaling \$22,450.00 from ten (10) individuals.

On December 9, 2014, an RFAI was sent to the Committee referencing the 2014 12 Day Pre-General Report (Image 14330067450). The RFAI noted the Committee's receipt of excessive contributions and requested that the Committee take corrective action.

On January 9, 2015, the Committee filed an FEC Form 99 outlining the corrective action taken regarding apparent excessive contributions. The FEC Form 99 stated, in part: "Individuals or Committees that appear to exceed the contribution limits have been refunded or reattributed" (Image 15020032731).

Also on January 9, 2015, the Committee filed the 2014 Year-End Report covering the period from November 25, 2014 to December 31, 2014 (Image 15020032741). This report disclosed refunds totaling \$22,450.00 in General Election contributions from ten (10) individuals that were made outside the permissible timeframe (Attachment 2).

2014 30 Day Post-General Report

During the 2014 30 Day Post-General reporting period, the Committee received excessive contributions totaling \$5,250.00 from three (3) individuals that were not refunded, reattributed, or redesignated within the permissible timeframe (Attachment 2).

On December 4, 2014, the Committee filed the 2014 30 Day Post-General Report covering the period from October 16, 2014 to November 24, 2014 (Image 14021332391). This report disclosed excessive contributions totaling \$26,700.00 from twenty (20) individuals.

On January 9, 2015, the Committee filed the 2014 Year-End Report covering the period from November 25, 2014 to December 31, 2014 (Image 15020032741). This report disclosed refunds remedying seventeen (17) individual contributions, totaling \$21,450.00, that were received during the 2014 30 Day Post-General reporting period.

On January 12, 2015, an RFAI was sent to the Committee referencing the 2014 30 Day Post-General Report. The RFAI noted the Committee's receipt of excessive contributions and requested that the Committee take corrective action⁵ (Image 15330071816).

On January 16, 2015, the Reports Analysis Division (RAD) Analyst spoke to the Treasurer at that time, Paul Kilgore, regarding the RFAI sent on the Amended 2014 October Quarterly Report. The Analyst asked if the Committee was preparing a response

⁵ At the time the RAD Analyst reviewed the 2014 30 Day Post-General Report, the 2014 Year-End Report had not yet been received by the FEC. As a result, the RFAI cited seventeen (17) excessive contributions that had been remedied on the 2014 Year-End Report.

and the Treasurer stated the Committee responded by filing two (2) FEC Form 99's. The Analyst confirmed receipt of the documents (Attachment 4).

On February 27, 2015, the RAD Analyst called Mr. Kilgore regarding the RFAI's referencing the Amended 2014 October Quarterly, 2014 12 Day Pre-General, and 2014 30 Day Post-General Reports. The Analyst indicated that due to the lateness of the refunds and redesignations, the issue may be referred to another Commission office for further action. In addition, the Analyst encouraged the Committee to take any other corrective action and provide an explanation for the public record (Attachment 4).

To date, no further communications have been received from the Committee regarding this matter.

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Treasurer Name: VINCENT DEVITO Address: ONE INTERNATIONAL PLACE 44TH FL BOWDITCH & DEWEY, LLP, DOSTON, MA 02110

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Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Report

2014 October Quarterly Report (8/21/2014 - 9/30/2014)

Contributor Name	Date	Amount	Election	Excessive Amount Received During Reporting Period? & Not Refunded Within Timeframe	Refunded Outside of Timeframe	Refunded # Days Since Receipt
ALLISON, ELISABETH K MS	9/29/2014	\$2,600.00	G, 2014			
ALLISON, ELISABETH K MS	9/30/2014	\$100.00	G, 2014			
ALLISON, ELISABETH K MS	12/30/2014	-\$1,200.00	G, 2014	\$100.00	\$100.00	91
ATCHINSON, BOB MR	9/30/2014	\$5,200.00	G, 2014			
ATCHINSON, BOB MR	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	91
FISHER, JOHN J	7/17/2014	\$2,600.00	G, 2014			
FISHER, JOHN J	9/16/2014	\$2,600.00	G, 2014			
FISHER, JOHN J	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	105
FORSTER, PETER C MR	5/22/2014	\$2,600.00	G, 2014			·' .
FOSTER, PETER	9/27/2014	\$2,600.00	G, 2014			
FORSTER, PETER C MR	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	94
HELLER, BEN MR	9/9/2014	\$10,400.00	P, 2014			
HELLER, BEN MR	12/31/2014	-\$5,200.00	P, 2014	\$7,800.00	\$5,200.00	113
HUMPHREY, PATRICIA G MS	9/16/2014	\$1,600.00	G, 2014			
HUMPHREY, PATRICIA G MS	9/27/2014	\$2,600.00	G, 2014			
HUMPHREY, PATRICIA G MS	12/30/2014	-\$1,600.00	G, 2014	\$1,600.00	\$1,600.00	94
IACOVELLI, KAREN MRS	9/30/2014	\$5,200.00	G, 2014			

¹ The coverage dates for the 2014 October Quarterly Report were adjusted to reflect the 2014 12 Day Pre-Primary Report covering July 1, 2014 to August 20, 2014.

² This includes only the excessive amount for contributions disclosed on the above report.

Attachment 2

Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Report

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014 \$1,600.00 \$1,600.00 93 014 \$2,600.00 \$2,600.00 91 014 \$2,600.00 \$2,600.00 101 014 \$2,600.00 \$2,600.00 101 014 \$2,600.00 \$2,600.00 101 014 \$2,400.00 \$2,400.00 98 014 \$2,400.00 \$2,400.00 98							
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514 \$2,600.00 \$2,600.00 91 514 \$2,600.00 101 514 \$2,600.00 101 514 \$2,400.00 \$2,400.00 98 514 \$2,400.00 \$2,400.00 98	AITH, WILLIAM	12/30/2014	-\$1,600.00	G, 2014	\$1,600.00	\$1,600.00	93
014 \$2,600.00 \$2,600.00 91 014 \$2,600.00 \$2,600.00 101 014 \$2,600.00 \$2,600.00 101 014 \$2,400.00 \$2,400.00 98 014 \$2,400.00 \$2,400.00 98							
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014 \$2,600.00 \$2,600.00 101 014 \$2,600.00 \$2,600.00 101 014 \$2,400.00 \$2,400.00 98 014 \$2,400.00 \$2,400.00 98	ANARD, JAMES N MR	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	91
314 \$2,600.00 \$2,600.00 101 314 \$2,400.00 \$2,400.00 98 314 \$2,400.00 \$2,400.00 98							
314 \$2,600.00 \$2,600.00 101 314 \$2,400.00 \$2,400.00 98 314 \$2,400.00 \$2,400.00 98	VENSON, PETER	5/22/2014	\$2,600.00	.G, 2014			
314 \$2,600.00 \$2,600.00 101 314 \$2,400.00 \$2,400.00 98 335,100.0 \$35,100.0	VENSON, PETER	9/20/2014	\$2,600.00	G, 2014			:
014 \$2,400.00 \$2,400.00 S35,100.00	VENSON, PETER	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	101
514 \$2,400.00 \$2,400.00 98 515 \$2,400.00 \$35,100.00							
\$2,400.00	IDMAN, ROBERT	9/23/2014	\$5,000.00	G, 2014	क्षेत्रक कर्मन वास्त्र	, in parameters of	
	IDMAN, ROBERT	12/30/2014	-\$2,400.00	G, 2014	\$2,400.00	\$2,400.00	86
	tal Amount Not Remedied and/or Rem	nedied Outside Pe	rmissible Timefi	rame:			\$35,100.00

Attachment 2

Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Report

2014 12 Day Pre-General Report (10/1/2014 - 10/15/2014)

Contributor Name	Date	Amount	Election	Excessive Amount Received During Reporting Period ³ & Not Refunded Within Timeframe	Refunded Outside of Timeframe	Refunded # Days Since Receipt
BOSARGE, W ED	9/24/2014	\$2,000.00	G, 2014			
BOSARGE, W ED DR	10/2/2014	\$2,000.00	G, 2014			
BOSARGE, W ED DR	12/30/2014	-\$2,000.00	G, 2014	\$1,400.00	\$1,400.00	89
COBB, PATRICIA MRS	6/25/2014	\$2,400.00	G, 2014	-		
COBB, PATRICIA MRS	10/9/2014	\$1,000.00	G, 2014			
COBB, PATRICIA MRS	12/30/2014	-\$800.00	G, 2014	\$800.00	\$800.00	82
HALSTON, JOHN	10/14/2014	\$5,200.00	G, 2014			
HALSTON, JOHN	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	77
JOSLIN, JAMES L MR	6/24/2014	\$2,600.00	G, 2014			
JOSLIN, JAMES L MR	10/9/2014	\$5,200.00	G, 2014			
JOSLIN, JAMES L MR	12/30/2014	-\$6,200.00	G, 2014	\$5,200.00	\$5,200.00	82
LESSING, STEPHEN MR	10/9/2014	\$5,000.00	G, 2014			
LESSING, STEPHEN MR	12/30/2014	-\$2,400.00	G, 2014	\$2,400.00	\$2,400.00	82
PARIN, MICHAEL L MR	10/9/2014	\$5,200.00	G, 2014			
PARIN, MICHAEL L MR	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	82
ROLLINS, KEVIN B MR	10/1/2014	\$5,200.00	G, 2014			
ROLLINS, KEVIN B MR	12/30/2014	-\$2,600.00	G, 2014	\$2,600.00	\$2,600.00	90

³ This includes only the excessive amount for contributions disclosed on the above report.

Attachment 2

Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Report

	٠					
SHORTS, BINKLEY	9/30/2014	\$2,600.00 G, 2014	G, 2014			
SHORTS, BINKLEY	10/9/2014	\$2,000.00 G, 2014	G, 2014			
SHORTS, BINKLEY	12/30/2014	-\$2,000.00 G, 2014	G, 2014	\$2,000.00	\$2,000.00	.82
SIMON, ALLEN	9/25/2014	\$2,600.00 G, 2014	G, 2014			
SIMON, ALLEN	10/12/2014	\$250.00	\$250.00 G, 2014			
SIMON, ALLEN	12/30/2014	-\$250.00 G, 2014	G, 2014	\$250.00	\$250.00	79
TRAINA, TREVOR MR	8/26/2014	\$400.00	\$400.00 G, 2014			
TRAINA, TREVOR MR	10/9/2014	\$4,800.00 G, 2014	G, 2014			·
TRAINA, TREVOR MR	12/30/2014	-\$2,600.00 G, 2014	G, 2014	\$2,600.00	\$2,600.00	82
Total Amount Not Remedied and/or Remedied Outsi	edied Outside Per	de Permissible Timeframe:	rame:			\$22,450.00

2014 30 Day Post-General Report (10/16/2014 - 11/24/2014)

Contributor Name	Date	Amount	Election	Excessive Amount Received During Reporting Period ⁴ & Not Refunded Within Timeframe	Refunded Outside of Timeframe	Refunded # Days Since Receipt
BARRETT, JONATHAN	10/17/2014	\$5,200.00 G, 2014	G, 2014	\$2,600.00	N/A	N/A
BURR, CARLETON MR JR	9/16/2014	\$1,500.00 G, 2014	G, 2014			
BURR, CARLETON MR JR	9/22/2014	\$150.00	\$150.00 G, 2014			
BURR, CARLETON MR JR	10/17/2014	\$1,000.00 G, 2014	G, 2014	\$50.00	N/A	N/A
HILES, NANCY	10/26/2014	\$2,600.00 G, 2014	G, 2014			
HILES, NANCY	10/28/2014	\$2,600.00 G, 2014	G, 2014	\$2,600.00	N/A	N/A
Total Amount Not Remedied and/or Remedied Outsie	nedied Outside Pe	de Permissible Timeframe:	rame:			\$5,250.00

all reports):	
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de Timeframe (a	
it Remedied Outside Permissible	
nedied Outside F	
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Total A	

\$62,800.00

⁴ This includes only the excessive amount for contributions disclosed on the above report.

Attachment 2

Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

Name	Date	Contribution Amount	Election	Report	Excessive/Prohibited Amount Not Refunded within Timeframe	Refunded # Days Since Receipt
ALLISON, ELISABETH K MS	9/29/2014	\$2,600.00	G, 2014	2014 October Quarterly		
ALLISON, ELISABETH K MS	9/30/2014	\$100.00	G, 2014	2014 October Quarterly		
ALLISON, ELISABETH K MS	10/30/2014	\$1,000.00	G, 2014	2014 30 Day Post-General		
ALLISON, ELISABETH K MS	11/2/2014	\$100.00	G, 2014	2014 30 Day Post-General		
ALLISON, ELISABETH K MS	12/30/2014	-\$1,200.00	G, 2014	2014 Year-End	\$100.00	91
ATCHINSON, BOB MR	9/30/2014	\$5,200.00	G, 2014	2014 October Quarterly		
ATCHINSON, BOB MR	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	91
BARRETT, JONATHAN	10/17/2014	\$5,200.00	G, 2014	2014 30 Day Post-General	\$2,600.00	N/A
BOSARGE, ED DR	10/21/2014	\$600.00	G, 2014	2014 30 Day Post-General		-
BOSARGE, W ED	9/24/2014	\$2,000.00	G, 2014	2014 October Quarterly		
BOSARGE, W ED DR	10/2/2014	\$2,000.00	G, 2014	2014 12 Day Pre-General		
BOSARGE, W ED DR	12/30/2014	-\$2,000.00	G, 2014	2014 Year-End	\$1,400.00	89
BURR, CARLETON MR JR	9/16/2014	\$1,500.00	G, 2014	2014 October Quarterly		
BURR, CARLETON MR JR	9/22/2014	\$150.00	G, 2014	2014 October Quarterly		
BURR, CARLETON MR JR	10/17/2014	\$1,000.00	G, 2014	2014 30 Day Post-General	\$50.00	N/A
COBB, PATRICIA MRS	6/25/2014	\$2,400.00	G, 2014	2014 July Quarterly		
COBB, PATRICIA MRS	10/9/2014	\$1,000.00	G, 2014	2014 12 Day Pre-General		
COBB, PATRICIA MRS	12/30/2014	-\$800.00	G, 2014	2014 Year-End	\$800.00	82
FISHER, JOHN J	7/17/2014	\$2,600.00	G, 2014	2014 12 Day Pre-Primary		
-						•

Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

FISHER, JOHN J	9/16/2014	\$2,600.00	G, 2014	2014 October Quarterly		
FISHER, JOHN J	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	105
FORSTER, PETER C MR	5/22/2014	\$2,600.00	G, 2014	2014 July Quarterly		
FOSTER, PETER	9/27/2014	\$2,600.00	G, 2014	2014 October Quarterly		
FORSTER, PETER C MR	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	94
HALSTON, JOHN	10/14/2014	\$5,200.00	G, 2014	2014 12 Day Pre-General		
HALSTON, JOHN	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	77
HELLER, BEN MR	9/9/2014	\$10,400.00	P, 2014	2014 October Quarterly		
HELLER, BEN MR	12/31/2014	-\$5,200.00	P, 2014	2014 Year-End	\$7,800.00	113
HILES, NANCY	10/26/2014	\$2,600.00	G, 2014	2014 30 Day Post-General		
HILES, NANCY	10/28/2014	\$2,600.00	G, 2014	2014 30 Day Post-General	\$2,600.00	N/A
HUMPHREY, PATRICIA G MS	9/16/2014	\$1,600.00	G, 2014	2014 October Quarterly		
HUMPHREY, PATRICIA G MS	9/27/2014	\$2,600.00	G, 2014	2014 October Quarterly		
HUMPHREY, PATRICIA G MS	12/30/2014	-\$1,600.00	G, 2014	2014 Year-End	\$1,600.00	94
IACOVELLI, KAREN MRS	9/30/2014	\$5,200.00	G, 2014	2014 October Quarterly	-	
IACOVELLI, KAREN MRS	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	91
JOSLIN, JAMES L MR	6/24/2014	\$2,600.00	G, 2014	2014 July Quarterly		
JOSLIN, JAMES L MR	10/9/2014	\$5,200.00	G, 2014	2014 12 Day Pre-General		
JOSLIN, JAMES L MR	10/21/2014	\$1,000.00	G, 2014	2014 30 Day Post-General		
JOSLIN, JAMES L MR	12/30/2014	-\$6,200.00	G, 2014	2014 Year-End	\$5,200.00	82

Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

KAGELEIRY, CHARLES P MR	9/16/2014	\$3,000.00	G, 2014	2014 October Quarterly		
KAGELEIRY, CHARLES P MR	12/30/2014	-\$400.00	G, 2014	2014 Year-End	\$400.00	105
KINGSTON, JOHN MR	9/25/2014	\$5,200.00	G, 2014	2014 October Quarterly		
KINGSTON, JOHN MR	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	96
LESSING, STEPHEN MR	10/9/2014	\$5,000.00	.G, 2014	2014 12 Day Pre-General		
LESSING, STEPHEN MR	12/30/2014	-\$2,400.00	G, 2014	2014 Year-End	\$2,400.00	82
NICHOLSON, DAVID	9/10/2014	\$1,000.00	G, 2014	2014 October Quarterly		
NICHOLSON, DAVID	9/18/2014	\$2,000.00	G, 2014	2014 October Quarterly		
NICHOLSON, DAVID	12/30/2014	-\$400.00	G, 2014	2014 Year-End	\$400.00	103
PARIN, MICHAEL L MR	10/9/2014	\$5,200.00	G, 2014	2014 12 Day Pre-General		
PARIN, MICHAEL L MR	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	82
ROLLINS, KEVIN B MR	10/1/2014	\$5,200.00	G, 2014	2014 12 Day Pre-General		
ROLLINS, KEVIN B MR	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	90
ROTHMAN INSTITUTE PAC	9/30/2014	\$5,200.00	G, 2014	2014 October Quarterly		
ROTHMAN INSTITUTE PAC	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	91
SHORTS, BINKLEY	9/30/2014	\$2,600.00	G, 2014	2014 October Quarterly		
SHORTS, BINKLEY	10/9/2014	\$2,000.00	G, 2014	2014 12 Day Pre-General		
SHORTS, BINKLEY	12/30/2014	-\$2,000.00	G, 2014	2014 Year-End	\$2,000.00	82
SIMON, ALLEN	9/25/2014	\$2,600.00	G, 2014	2014 October Quarterly		
SIMON, ALLEN	10/12/2014	\$250.00	G, 2014	2014 12 Day Pre-General		

Strong Country For Today & Tomorrow (SCOTTPAC) (C00560003)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

					;		
SIMON, ALLEN	12/30/2014	-\$250.00	G, 2014	2014 Year-End	\$250.00	79	
SMITH, WILLIAM	9/28/2014	\$4,200.00	G, 2014	2014 October Quarterly			-
SMITH, WILLIAM	12/30/2014	-\$1,600.00	G, 2014	2014 Year-End	\$1,600.00	93	
STANARD, JAMES N MR	9/30/2014	\$5,200.00	G, 2014	2014 October Quarterly		-	
STANARD, JAMES N MR	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	91	
SWENSON, PETER	5/22/2014	\$2,600.00	G, 2014	2014 July Quarterly		-	
SWENSON, PETER	9/20/2014	\$2,600.00	G, 2014	2014 October Quarterly			
SWENSON, PETER	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	101	
TRAINA, TREVOR MR	8/26/2014	\$400.00	G, 2014	2014 October Quarterly		-	
TRAINA, TREVOR MR	10/9/2014	\$4,800.00	G, 2014	2014 12 Day Pre-General			
TRAINA, TREVOR MR	12/30/2014	-\$2,600.00	G, 2014	2014 Year-End	\$2,600.00	82	
ZEIDMAN, ROBERT	9/23/2014	\$5,000.00	G, 2014	2014 October Quarterly			
ZEIDMAN, ROBERT	12/30/2014	-\$2,400.00	G, 2014	2014 Year-End	\$2,400.00	86	
Total Excessive/Prohibited Amount Not Refund		led Within Timeframe:				\$62,800.00	

tal Amount Remedied Outside of the Permissible Timeframe (all reports):	\$54,950.00
tal Amount Unremedied (all reports):	87,850.00
tal Amount Not Remedied Within Timeframe (all reports):	\$62,800.00